

Message

From: Goodis, Michael [Goodis.Michael@epa.gov]
Sent: 4/27/2021 8:00:38 PM
To: Nesci, Kimberly [Nesci.Kimberly@epa.gov]; Dawson, Jeffrey [Dawson.Jeff@epa.gov]
Subject: RE: Question about risk assessment of PFAS in Pesticides

Agreed – please set something up.

Michael L. Goodis, P.E.
Acting Deputy Director for Programs
Office of Pesticide Programs
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
Washington, D.C.
571-309-5497 (cell)

From: Nesci, Kimberly <Nesci.Kimberly@epa.gov>
Sent: Tuesday, April 27, 2021 3:33 PM
To: Dawson, Jeffrey <Dawson.Jeff@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>
Subject: RE: Question about risk assessment of PFAS in Pesticides

Thoughts below. I'm thinking we should schedule a meeting with you, MG, Ed, Rick, Marietta, Dana to strategize. Anyone else to include? Mike, you agree?

From: Dawson, Jeffrey <Dawson.Jeff@epa.gov>
Sent: Tuesday, April 27, 2021 2:58 PM
To: Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>
Subject: RE: Question about risk assessment of PFAS in Pesticides

We should probably talk about this. You knew this issue was coming. Yep. There are a lot of questions around a PFAS risk assessment.

At this point for the mosquito control products we could **Ex. 5 Deliberative Process (DP)**

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP) This can be done with no additional exposure data. Yes, recognizing that our lab data isn't truly a representative sample of mosquito products – **Ex. 5 Deliberative Process (DP)** We'll have additional information on other products eventually. They may be reporting out something at the 4:15 meeting. She wants to talk first, hence it being moved to 4:15.

We would also need to define a hazard value. There are some values available for PFOA and Gen X chemicals I believe (Tala would know this better than me). **Ex. 5 Deliberative Process (DP)**

Essentially what you would get would be a best available outcome. **Ex. 5 Deliberative Process (DP)**

Ex. 5 Deliberative Process (DP)

Could we do this to **Ex. 5 Deliberative Process (DP)**

Ex. 5 Deliberative Process (DP)

I suspect that the states, NGOs and others can figure out how to do this kind of analysis. It may be a bit preemptive for any control of such a narrative.

Thoughts?

Jeffrey L Dawson
Senior Science Advisor
Immediate Office
U.S. EPA, Office of Chemical Safety and Pollution Prevention
1200 Pennsylvania Ave NW (7101M)
Washington, DC. 20004
703-305-7329
Email: dawson.jeff@epa.gov
Deliveries: 1201 Constitution Ave NW, Washington, DC 20004

From: Nesci, Kimberly <Nesci.Kimberly@epa.gov>
Sent: Tuesday, April 27, 2021 2:37 PM
To: Wijnja, Hotze (AGR) <hotze.wijnja@state.ma.us>
Cc: Goodis, Michael <Goodis.Michael@epa.gov>; Dawson, Jeffrey <Dawson.Jeff@epa.gov>
Subject: RE: Question about risk assessment of PFAS in Pesticides

Hi Hotze,

Thanks for your note. With regards to your specific questions below, I don't know the answer. I do know that this is not something that would be done out of my lab. Mike and Jeff, do you know the answer to this, or who might know?

Best,
Kimberly

Kimberly Nesci, Director
Biological and Economic Analysis Division (BEAD)
Office of Pesticide Programs
Office of Chemical Safety and Pollution Prevention
703-969-9109 (cell)

From: Wijnja, Hotze (AGR) <hotze.wijnja@state.ma.us>
Sent: Tuesday, April 27, 2021 12:51 PM
To: Nesci, Kimberly <Nesci.Kimberly@epa.gov>
Subject: Question about risk assessment of PFAS in Pesticides

Hello Kim,

You may remember me from the SFIREG meeting a few weeks ago. The responses and updates you provided were helpful in gaining a better understanding of the effort to address the questions and challenges related to the emerging issue of PFAS contaminants in pesticide products.

Here in Massachusetts, the Department of Agricultural Resources (MDAR) is involved in a multi-agency effort to conduct an assessments of PFAS residues in pesticide products used for mosquito control in Massachusetts.

Our effort involves the consideration of exposure information from existing assessments for mosquito control products (such as EPA's assessment for d-phenothrin) and the PFAS Reference Dose established by MassDEP to propose a level of

residual PFAS that should not be exceeded for mosquito control spraying. This level of residual PFAS (in the product) would be used as an evaluative criterion for interpreting laboratory testing of the product prior to any 2021 spraying.

I was asked to contact US EPA/OPP with the following request:

- An understanding if EPA will be conducting an exposure/risk assessment of PFAS residues in pesticides to understand risks of previous applications (e.g., retrospective analysis), or a prospective assessment to establish a regulatory or guidance criterion/tolerance level for PFAS residues in Anvil 10+10 (or similar pesticides).

We would appreciate any guidance that you may be able provide.

Best regards,

Hotze Wijnja
Environmental Chemist
Massachusetts Department of Agricultural Resources
251 Causeway Street, Suite 500
Boston, MA 02114-2151
Tel: 617-626-1771
Fax: 617-626-1850
www.mass.gov/agr